

## REMARKS

Claims 1-14 are pending in the present application and stand rejected. Claims 1 and 8 have been amended. Claim 15 has been added. The Examiner's reconsideration is respectfully requested in view of the above amendment and the following remarks.

Claims 1, 3, 8 and 10 stand rejected under 35 U.S.C. § 102(b) as being anticipated by Fujioka et al. (U.S. Patent No. 4,908,704) (hereinafter "Fujioka").

Claims 4, 7, 11 and 14 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Fujioka in view of Karmann (U.S. Patent No. 5,034,986) (hereinafter "Karmann").

Claims 2, 6, 9 and 13 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Fujioka in view of M. Ostendorf et al., "HMM topology design using maximum likelihood successive state splitting" (hereinafter "Ostendorf") and Karmann.

Claims 5 and 12 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Karmann in view of Abbott (U.S. Patent No. 5,999,634) (hereinafter "Abbott") and Higashikubo et al. (U.S. Patent No. 5,999,635) (hereinafter "Higashikubo").

The recited references, alone or in any combination, do not teach or suggest "estimating *geometric parameters for representing size changes of objects as the objects are moved at various depths in a given frame*, the geometric parameters comprising a *weighting* for each pixel in the given frame," as claimed in claim 1.

Fujioka teaches dividing a stored image into blocks. (Fujioka, col. 3, lines 41-42). Blocks, as taught by Fujioka, are simply *subsets of the entire image*, which can reach as small as a single pixel, or can be units of a plurality of pixels. (Fujioka, col. 3, lines 48-49). Fujioka is entirely unrelated to estimating "geometric parameters" representing size

changes. Even assuming, *arguendo*, that the blocks are “geometric parameters,” Fujioka does *not* disclose that the blocks provide any *weighting* of the pixels (i.e., each pixel in Fujioka is of the same weight regardless of the size of the block) or representation for *size changes of objects as the objects are moved at various depths*. Neither Abbott nor Higashikubo cures these deficiencies in Fujioka.

Further, the recited references, alone or in any combination, do not teach or suggest a determination of congestion accounting for *both* a change in images (i.e., “change detection map”) *and* object size changes (i.e., “geometric parameters”). One ordinarily skilled in the art can readily appreciate that not only do people move *in and out* of the given frame, but people also move at various depths *within* the given frame. As people move in and out of the given frame, the level of congestion on the given frame will likely increase or decrease accordingly. However, as people move at various depths within the given frame, the people may change size in the images while the level of congestion may remain the same. The recited references, alone or in any combination, neither contemplate nor account for such a scenario.

Accordingly, claim 1 is believed to be patentably distinguished and not rendered obvious over the recited references, alone or in any combination. Independent claims 8 and 15 are believed to be allowable for at least the reasons provided for claim 1. Dependent claims 2-7 and 9-14 are believed to be allowable for at least the reasons given for claims 1 and 8. Withdrawal of the claim rejections of claims 1-14 is respectfully requested.

In view of the foregoing remarks, it is respectfully submitted that all the claims now pending in the application are in condition for allowance. Early and favorable reconsideration is respectfully requested.

Respectfully submitted,

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